

IN THE DISTRICT COURT OF THE UNITED STATES
for the Western District of New York

OCTOBER 2024 GRAND JURY
(Impaneled 10/25/2024)

THE UNITED STATES OF AMERICA INDICTMENT

-vs-

DARRYL LAMONT PAUL, a/k/a
DARRYL LAMONT

Violations:

Title 21, United States Code,
Section 856(a)(1); and
Title 18, United States Code, Sections
1591(a)(1), 1594(c), and 2421(a).

(9 Counts and 1 Forfeiture Allegation)

INTRODUCTION

The Grand Jury Charges That:

At all times relevant to this Indictment:

1. The defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT** (**“LAMONT”**), owned and operated NOLIMIT ENTERTAINMENT (**“NLE”**), a company that provided entertainment for stag parties and similar events in the form of female dancers and bartenders.

2. Beginning in or about 2021, the defendant, **LAMONT**, operated NLE from his residence within the Western District of New York.

3. The defendant, **LAMONT**, maintained relationships with strip clubs in Western New York, including, but not limited to, Pharoah's Gentlemen's Club, The Body Shop, and 24-Karat Gold. **LAMONT** frequented the strip clubs, made connections with management and security guards, and recruited women who worked at those clubs to work for NLE.

4. The defendant, **LAMONT**, conducted interviews of potential female employees at his residence, during which interviews he required the females to remove their clothing, and at times provided them with alcohol and/or cocaine. It was part of the interview process that **LAMONT** made representations to the women that he had connections to powerful people, including law enforcement. It was further part of the interview process that **LAMONT**, with knowledge of the women's financial difficulties, made representations to them that they could make more money working for him than at a strip club.

5. The defendant, **LAMONT**, required the women he hired to sign a contract which, among other things, controlled their ability to work if they left his employment.

6. The defendant, **LAMONT**, controlled his female employees' ability to earn money by controlling their salary and the number and type of parties they were assigned to work. Before parties, **LAMONT** required female employees to meet at his residence, where he provided them alcohol and cocaine before transporting them to the party. At the parties, **LAMONT** required dancers to perform sex acts on each other in order to bring in more money from party attendees. **LAMONT** required the female employees to return to his

residence following the parties, at which time the money and tips received would be counted and **LAMONT** would take his cut.

7. The defendant, **LAMONT**, hired security guards who assisted **LAMONT** in transporting the women to and from parties and running the parties when **LAMONT** was not available to do so.

COUNT 1
(Using and Maintaining a Drug-Involved Premises)

The Grand Jury Charges That:

8. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

9. From in or about 2021, the exact date being unknown to the Grand Jury, until on or about March 13, 2025, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did unlawfully and knowingly use and maintain a place, that is, the premises at 1035 Beach Road, Apartment B9, Cheektowaga, New York, for the purpose of manufacturing, distributing, and using cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 2
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

10. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

11. Between in or about 2010, and in or about 2011, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 1, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 3
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

12. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

13. In or about 2013, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a**

DARRYL LAMONT, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 2, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 2 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 4
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

14. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

15. In or about 2017, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 3, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 5
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

16. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

17. Between in or about 2016, and in or about 2019, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 4, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 6
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

18. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

19. Between in or about 2019, and in or about 2023, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT**

PAUL, a/k/a DARRYL LAMONT, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 5, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 7
(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury Further Charges That:

20. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

21. In or about July 2024, the exact dates being unknown to the Grand Jury, in the Western District of New York, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, a person, that is, Victim 6, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim 6 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 8
(Conspiracy to Commit Sex Trafficking by Force, Fraud and Coercion)

The Grand Jury Further Charges That:

22. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

23. Beginning in or about 2000, and continuing until in or about March 2025, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly and willfully combine, conspire, and agree with others, known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, in and affecting interstate commerce, persons known and unknown to the Grand Jury, and to knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause such persons to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 9
**(Transportation Across State Lines of an Individual
with Intent that Such Individual Engage in Prostitution)**

The Grand Jury Further Charges That:

24. The allegations of the Introduction are re-alleged and incorporated by reference as if fully set forth herein.

25. On or about July 13, 2019, the exact date being unknown to the Grand Jury, in the Western District of New York and elsewhere, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, did knowingly transport an individual, that is, Victim 5, a person known to the Grand Jury, in interstate commerce with the intent that Victim 5 engage in prostitution.

All in violation of Title 18, United States Code, Section 2421(a).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of one or more of the offenses set forth in Counts 1 through 9 of this Indictment, the defendant, **DARRYL LAMONT PAUL, a/k/a DARRYL LAMONT**, shall forfeit to the United States, all his right, title, and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation and/or any and all property used, and intended to be used, in any manner or part, to commit or to facilitate the commission of said violation, including, but not limited to the following seized from the defendant, by law enforcement, on or about March 13, 2025, in Williamsville, New York:

- a. One (1) Samsung Galaxy Cellphone, IMEI 351558961684281; and
- b. One (1) Samsung Galaxy Cellphone, IMEI 355298662020099.

All pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p), Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1), 1594(d)(2), and 2428(a)(1), and/or Title 28, United States Code, Section 2461.

DATED: Buffalo, New York, June 24, 2025.

MICHAEL DIGIACOMO
United States Attorney

BY: S/CAITLIN M. HIGGINS
CAITLIN M. HIGGINS
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716/843-5818
Caitlin.Higgins@usdoj.gov

A TRUE BILL:

S/FOREPERSON
FOREPERSON